

Robert W. Quinn, Jr. Federal Government Affairs Vice President Suite 1000 1120 20th Street NW Washington DC 20036 202 457 3851 FAX 202 457 2545

May 15, 2002

Electronic Filing
Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th St., SW, Room TWB-204
Washington, DC 20554

Re: Notice of Ex Parte Contact:

<u>Second Joint Application of BellSouth For Authorization Under Section 271 Of The Communications Act</u>
<u>To Provide In-Region, InterLATA Service In The States Of Georgia and Louisiana, CC Docket No. 02-35</u>

Dear Ms. Dortch:

On Tuesday May 14, 2002, I spoke with Monica Desai, Commissioner Martin's Legal Adviser, two times regarding the above referenced proceedings. In those conversations, I reiterated AT&T's opposition to BellSouth's application for all of the reasons articulated by AT&T in its Comments, Reply Comments and ex parte filings in this docket. In particular, we focused on the OSS change management issues. I stated that the backlog situation present for feature change requests was unique to BellSouth and was not present in other territories. In addition, I cautioned that a firm requirement to implement feature change requests within a specified time period after acceptance and validation is necessary to insure that the backlog situation gets completely resolved. Specifically, I stated that BellSouth could not be permitted to purportedly "cure" its backlog situation by addressing the existing feature change requests, while new requests are simply be queued up behind those existing backlogged feature change requests. Rather, that BellSouth must be required to address the backlog while remaining current on new feature change requests. Finally, I provided the attached document to Ms. Desai in response to specific inquiries.

The positions expressed by AT&T during the meeting were consistent with those contained in the Comments and ex parte filings previously made in each of these dockets. One copy of this Notice is being submitted in accordance with the Commission's rules.

Sincerely,

Robert W. Zummy.

Enclosures

cc:

Monica Desai

Current Status of "New" CRs as of 2/20/02

	Change Request	Type	Submission Date	Current Status ¹	Comments
1	132 (Fielded	5	8/00	New	1/02 BST sent e-mail
	CNs)				saying BST is still
					investigating. 3/02 e-
					mail to CLEC
					requesting information.
					(see page 1 of log)
					(1 year, 9 months in
					new status)
2	222 (Unknown	5	11/00	New	10/01-BST advised
	USOCS)				request is still being
					reviewed by internal
					BST SME (1 year, 6
					months in new status)
3	245 Manual vs.	5	12/00	New	10/01-BST advised
	Mechanized				request is still being
	Notifications)				reviewed by internal
					BST SME (1 year, 5
					months in new status)
4	320 (Line Loss)	5	02/01	New	10/01 –BST forwarded
					info from CLEC to
-				* -	BST SME
					(1 year, 2 months in
<u> </u>			00.101	~	new status)
5	357 (Business	5	03/01	Scheduled	03/02 – Placed in
	Rules & elec.				Scheduled Status (no
	ordering)				record of pending or
	*				candidate request
	4				status in log)
	400 (T. 4	_	05/01	\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\	(1 year in new status)
6	400 (Interval	5	05/01	New	10/01 BST SME
	Change)				reviewing CLEC
İ					appeal
7	404 (5/01	D1.	(1 year in new status)
7	404 (currently	5	5/01	Pending	3/02 –Placed in
	documentation)				Pending Status (after
0	442 (D:11:	5	6/01	Dandina	10 months)
8	443 (Billing	5	6/01	Pending	3/02 -Placed in
	Notifier)				Pending Status (after 9
	116	5	7/01	Norr	months) 9/01-BST
9	(EDNI/DESID)	3	7/01	New	· ·
	(FRN/RESID)				acknowledged CLEC
				<u> </u>	appeal (10 months in

¹ Based on 4/3/02 BellSouth Change Control Log (most current log on web-site)

Current Status of "New" CRs as of 2/20/02

<u></u>					new status)
10	461 (Facility Check)	4	8/01	Pending	3/02 -Placed in Pending Status –
					changed to regulatory (after 7 months)
11	466 (CSR)	5	08/01	Pending	3/02-Placed in Pending Status (after 7 months)
12	468 (Auto-Clar)	4	08/01	Pending	3/02 -Placed in Pending Status (after 7 months)
13	477 Elec.	5	08/01	New	11/01 –BST advised
	Jeopardy				waiting on response from BST SME –(9 months in new status)
14	497 (line	5	09/01	Cancelled	3/02 Cancelled
	487 (line splitting)				
15	505 (ISDN – PRI)	4/2	09/01	Pending	3/02 – Placed in Pending Status (after 6 months)
16	506 (Frame relay)	4/2	09/01	Pending	3/02 – Placed in Pending Status (after 6 months)
17	586 (FOC/jeop)	5	01/02	Type 6 -Defect	2/02 BST reclassified as a defect
18	587 (Req type CB)	5	01/02	Cancelled	3/02 Cancelled
19	622 (Loop Mod)	5/2	01/02	Pending	3/02 –Placed in Pending Status
20	625 (DSL removal)	5/2	01/02	Pending	2/02 – Placed in Pending Status
21	644 (Loop Orders)	5	02/02	Cancelled	3/02 –Cancelled by CLEC
22	645 (Business Rules)	4/2	02/02	Cancelled	3/02 – Cancelled by BST
23	646 (Number port)	4	02/02	Cancelled	3/02 – Cancelled by BST
24	647 (Reqtyp J)	4	02/02	Cancelled	3/02 – Cancelled by BST
25	651 (CSR Parsing -hunting)	4/2/5	02/02	Implemented	3/02 - Implemented
26	652 (Parsing)	4/2/5	02/02	Pending	02/02 Placed in Pending Status
27	653 (Business Rules)	4	02/02	Implemented	03/02 Changed to defect and implemented

Current Status of "New" CRs as of 2/20/02

28	654 (Loop conversion acceptance interval)	5	02/02	New	04/02 Sent alternative solution recommendation to CLEC
29	655 (PIC/LPIC)	5	02/02	Pending	03/02 Placed in Pending Status

New	8 (7 of the 8 have been in status from 9 months to 1 year, 9 months)
Pending	11 (7 of the 11 were in new status for new status for 6 or more months before being placed in pending status)
Scheduled	1
Implemented	2
Cancelled/Reclassified as defect	7
Total	29